

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
THOMAS ALLEN DREBOT and	:	
KATHY ELAINE DREBOT,	:	CHAPTER 13
Debtors	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	CASE NO. 1-25-bk-00685-HWV
Movant	:	
	:	
THOMAS ALLEN DREBOT and	:	
KATHY ELAINE DREBOT,	:	
Respondents	:	

TRUSTEE’S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 30th day of June 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtors’ Plan for the following reasons:

1. Debtors’ Plan violates 11 U.S.C. § 1322(a)(1) and § 1325(b) in that Debtors have not submitted all or such portion of the disposable income to Trustee as required. More specifically,

Trustee alleges, and therefore avers, that Debtors’ disposable income is greater than that of which is committed to the Plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. The Plan does not pay either the monthly Means Test minimum or interest to unsecured creditors.
2. Trustee avers that Debtors’ Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid – 100% Plan. The Plan must pay at least \$46,416.00 in order to be properly funded. It must pay more if interest is paid to unsecured creditors.

WHEREFORE, Trustee alleges and avers that Debtors’ Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 30th day of June 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Paul Murphy-Ahles, Esquire
Dethlefs, Pykosh & Murphy
2132 Market Street
Camp Hill, PA 17011

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee